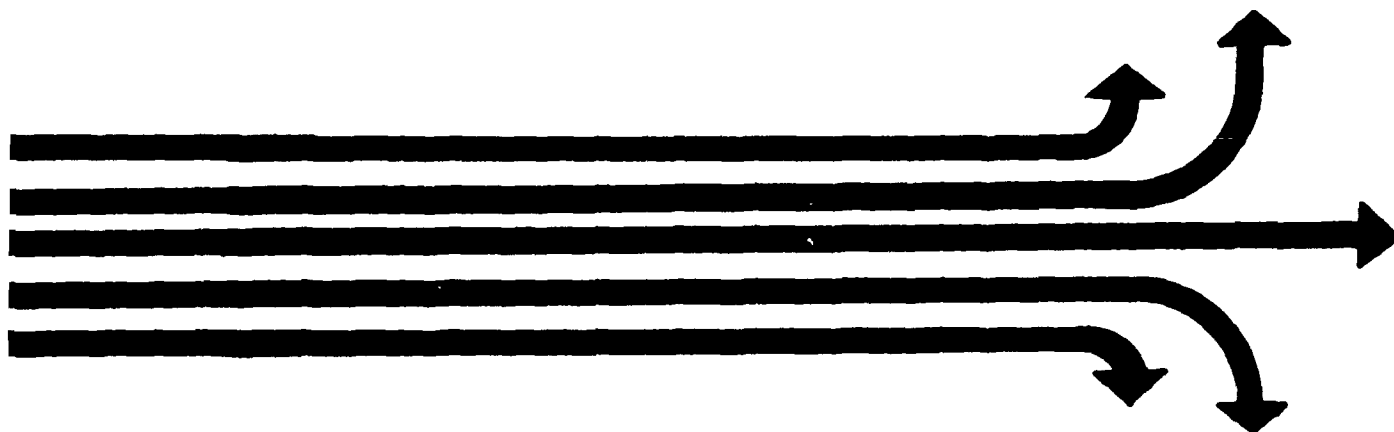Assistant Secretary, of Defense
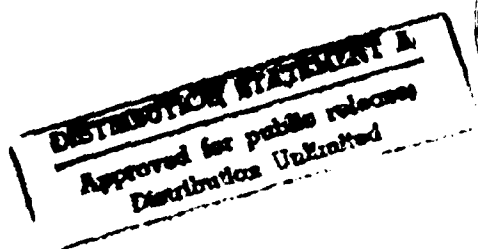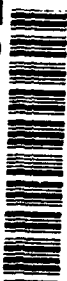(Force Management and Personnel)
(703) 692-2275

DOD 1400.20-3-M
APRIL 1980

DOD PROGRAM FOR STABILTY OF CIVILIAN EMPLOYMENT

PROGRAM EVALUATION GUIDELINES

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OFFICE OF THE ASSISTANT
SECRETARY OF DEFENSE

(MANPOWER, RESERVE AFFAIRS AND LOGISTICS)

THIS MANUAL SUPERCEDES DoD 1400.20-3-M DATED JUNE 1974

93-18195

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D. C. 20301

U 1 APR 1980

MEMORANDUM FOR Department of Defense Managers, Supervisors, and Civilian Personnel Management Staffs

The Department of Defense has taken firm measures over the years to promote stability of employment for career employees whose positions have been affected by changing mission requirements. The success of these measures is evidenced by the thousands of surplus Defense employees who have continued their Federal careers with the assistance of our automated referral policies and procedures. Clearly, however, our successes would not have been possible without the strong personal support of line managers, supervisors, and civilian personnel staffs throughout the Department.

After a recent Federal-wide review of agency efforts to assist displaced employees, the General Accounting Office concluded that the Defense program is the most effective in the Federal government. With the continued support of all concerned, it is our intent to maintain the Defense program as a model for others to follow.

The Guidelines contained in this manual represent an easy-to-use standard for examining and judging the effectiveness of operations under the Defense Program for Stability of Civilian Employment. We recommend this manual for your careful attention and frequent use as you strive to fulfill your program responsibilities.

Carl W. Clewlow

CARL W. CLEWLOW
Deputy Assistant Secretary of Defense
(Civilian Personnel Policy)

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PROGRAM EVALUATION GUIDELINES

PURPOSE

The purpose of the publication is to provide guidance in evaluating compliance with the spirit, intent and policies applicable to the DoD Program for Stability of Civilian Employment - with primary emphasis on the Priority Placement Program (PPP). Activities will take all reasonable and prudent actions to implement a responsive Priority Placement Program consistent with the merit system principles contained in DoD 1400.20-1-M and the Federal Personnel Manual. These evaluation guidelines have been prepared primarily to explain Department of Defense (DoD) concepts for evaluating the PPP and to be used as a guide by those engaged in evaluation. It should be of assistance in discerning significant facts, drawing valid conclusions from the facts, and reporting findings and recommendations. This Manual has several specific aims in PPP:

(a) Provide evaluators with a comprehensive procedure for use in planning and conducting reviews.

(b) Supply a common basis for uniform evaluation coverage, interpretation, and analysis.

(c) Serve as a guide for on-the-job training of personnelists and self-evaluation by personnel officers and staff.

(d) Provide guidance for maintaining quality control over the PPP.

EVALUATION, PHILOSOPHY AND OBJECTIVES

Operation of the PPP is founded on the principle of delegation of authority as far down the chain of command as possible without loss of control over policy and results. This permits decisions to be made promptly by those most intimately acquainted with operating conditions. Also, the coordinator span of control is broad and chain of command narrow to facilitate immediate action across component lines. This is designed to decrease significantly the time to move problems through normal chains of command by eliminating unnecessary layering and allow decisions to be made quickly with the delegated authority of OSD. Accordingly, emphasis is placed on providing timely and quality training, staff advice, and assistance.

The purpose of the PPP is to place fully qualified DoD employees into continuing positions. That means: "MAKE PLACEMENTS." In an inspection or evaluation the overriding question is whether the maximum number of placements possible are being made through the PPP, or is there merely compliance with the minimum required by regulation? The answer will indicate the presence of either a successful program or mere compliance with procedures; either fulfilling the spirit and intent of the program or merely performing a task. When there is a question of "doing the right thing" (spirit and intent), the coordinator structure is available to assist and guide.

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With this background, compliance reviews should be oriented toward program results rather than just meeting written program requirements. The principal objectives of surveys or inspections are:

(a) To evaluate how well activities are discharging the authority that has been delegated to them for managing the PPP and to provide a basis for such action as may be necessary to assure the proper exercise thereof.

(b) To keep DoD and the components informed of the effectivness with which the PPP is being implemented throughout their Departments.

(c) To appraise the quality of guidance and assistance provided installations by their Commands and components and to provide a factual basis for program planning to meet changing needs.

(d) To maintain uniformity of application of PPP policies and procedures throughout OSD and to recommend changes in regulations, procedures, and programs to meet the needs of the user and registrants.

(e) To provide consultative personnel management services to DoD activities.

(f) To communicate effective program ideas and techniques from one activity to another. To serve as a clearing house for innovative personnel methods and research.

AUTHORITY

The basic authority for the PPP is contained in DoD Directive 1400.20 dtd 13 August 1970. The authority for the conduct of evaluations and inspections and the requirement for internal evaluation is contained in DoD Manual 1400.20-1-M, subject: DoD Program for Stabiltiy of Civilian Employment. This Guideline is not all inclusive, but its use can serve to confirm compliance and identify violations, as well as to isolate systemic problems that cause error or decrease placements. It has been designed for use by 'outside' evaluators as well as for internal audit.

Nothing in these guidelines adds to or detracts from the authorities contained in DoD 1400.20-1-M, nor should the guidelines be interpreted as policy. They are a reflection of administration of policy and portray the thread of logic in the operation of the PPP. They are a methodology in reviewing and evaluating the PPP internally and externally. They are usable as an inspection manual and can be used as a training vehicle to gain insight into the policy contained in DoD 1400.20-1-M.

The Coordinator structure carries out quality control and program development responsibilities by conducting on-site evaluation and special studies. This Manual is designed as a guide for implementing a positive program to carry out these responsibilities.

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COORDINATOR STRUCTURE

The Coordinator structure consists of four Zone Coordinators, five Component Coordinators, and three Theatre Coordinators. They are assisted by Regional Coordinators for each component for each OPM region. Often, coordinator responsibility is an added duty to a personnel officer. Coordinators are responsible for interpretation and administration of policy and have the authority to speak with varying degrees of finality for their component or OSD depending upon the assignment of the Coordinator (Regional vs. Component vs. Zone vs. Theatre), and upon the questions involved. One of their responsibilities is to assure a consistent and smooth operation within the spirit and intent of the program.

QUALIFICATIONS OF EVALUATORS

Prior to conducting an audit, the individuals involved should possess the requisite body of knowledge to operate the system and the background to evaluate the results in relation to what was expected and what could have been accomplished above the minimum. The prime source is a thorough knowledge of DoD 1400.20-1-M. The Coordinator structure is the prime source to supplement the reading and study of 1400.20-1-M. The Coordinators are prepared to give on-site orientation and training to personnelists and managers on PPP. (The training does not substitute for the formal Courses in PPP, but supplements it.) Also, coordinators assist in training and orientation of those who need knowledge of PPP but don't need the skill to operate the system on a day-to-day basis. In summary, an evaluator should be an expert in the system prior to providing critique or guidance to others who are charged with system operation.

TYPES OF INSPECTIONS

There can be any number of different types of inspections ranging from matching all personnel actions over a given period of time against the Stopper List in effect preceding and during a given period of time, to a sampling of a limited number of actions, or possibly even the investigation of a single action to resolve a complaint or respond to an inquiry. A complete and detailed evaluation involves the matching of chronological journal copies of the SF 50's (Notification of Personnel Action) against the skills and priorities shown on Stopper Lists, identifying and tracing refill personnel actions, identifying and tracing newly assigned manpower spaces, identifying any delays in the submission of SF 52's (Request for Personnel Action), matching of vacancies, temporary appointees, temporary promotees, or reemployed annuitants against Stopper Lists, or in the submission of requisitions, or in making offers to registrants referred. A spot check of compliance may involve any one or more of these processes. A full compliance review should include them all. A full compliance review includes an evaluation of support by the Commander, the personnel office and managers in the organizations. It includes an assessment of program status:

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(1) where it is now
(2) how did it get to this point
(3) where it's going from here

Those charged with program administration should be able to answer definitively these questions, most particularly # 1 and # 3. The PPP is the primary DoD method of handling major reductions, realignments, and base closures. There is no substitute for other than full support. Knowledge of program status is a vital pre-requisite for full support.

PRE-AUDIT CHECK

In the pre-audit the evaluator should review any supplements or explanatory memoranda on PPP. This includes the Zone or Theatre Coordinator's operating instructions and monthly newsletters from Regional Coordinators as well as local issuances or SOP's. If systemic irregularities or violations have been discussed in prior correspondence, particularly correspondence on previous reviews of that activity, those areas should be reveiwed carefully. The personal interview process during the review should determine if the monthly newsletters (reports) are being circulated to those for whom they are designed, if they are reading them, and what impact they have on the program. Also, it should be of value in determining if the users have the requisite body of knowledge to be responsible for the operation of the system, and if they are being kept informed of program changes and updates.

PRIMARY AREAS FOR REVIEW

The major operating elements of the program which must be understood by an evaluator for a proper evaluation are: use of priorities, requisitioning, making offers, and audit trails. These topics are discussed below briefly.

Priorities   The DoD Manual (1400.20-1-M) describes the placement priorities to which registrants are entitled and the effect the priorities have on the filling of vacancies at activities for which registrants are available for placement. Priorities 1, 2 and 3 prohibit the filling of vacancies by appointment, promotions, demotions, transfers and reassignments. Priorities 4 and 5 prohibit appointments and transfers of employees from outside the component. The skills and priorities of registrants available for a given activity are reflected on the Stopper Lists for that activity. Stopper Lists are issued every two weeks and each list remains in effect until a new list is received.

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In essence, vacant, continuing (without a known termination date), full-time positions not otherwise covered by one of the exceptions authorized, must be matched against each Stopper List. Vacancies to be filled to which overseas employees have return rights are treated as uncommitted positions. Continuing, uncommitted positions occupied by temporary appointees, temporary promotees or remployed annuitants must be matched against each Stopper List. Also, activities must clear Stopper Lists for Priority 1, 2, and 3 in the commuting area when filling a temporary position from outside the workforce.

When a Stopper List match occurs, a requisition is to be submitted promptly. Delays in submitting requisitions that are not explained satisfactorily or that are not depicted clearly in the audit trail documents are an indication of non-support with a likely result being decreased placement opportunities or violations. Delays that appear avoidable but not reasonably explainable become prima facie evidence of needed corrections in the operation of the system at that activity.

Requisitioning   In response to a requisition, individual resumes of available registrants or an unmatched vacancy requisition indicating registrants are not available is furnished by the Centralized Referral Activity (CRA). These must be filed (in sequential order) and retained for at least two years. They are an integral portion of the audit trail. Resumes are issued in priority order and offers are to be made in priority order, i.e., Priority 1 before Priority 2, etc. Within a priority, offers are made to registrants in sequence: the commuting area, the state, the region, the zone, and then outside the zone. Precedence is given to component registrants within each successive expanding geographic area. The gaining activity may deviate from the sequence of offers within a priority when a registrant from a more distant location is considered significantly better qualified than one closer. It is intended that evaluators review those judgements only to the extent of determining that there exists reasonable rationale for deviating from the normal order of offers. There is no authority to deviate from the priority order.

Making Offers   Upon receipt of resumes, a decision must be made as to whom an offer will be made first, and then that offer will be communicated to the registering Civilian Personnel Office (CPO) by telephone. A careful review should be made of any delays in making offers. It is not proper to telephone the registering CPO of registrants referred to determine their availability and then start making offers. The fact that they are registered for that activity and appear on their Stopper List is adequate reason to believe that they are available. When registrants are contacted to inquire whether or not they would accept an offer and then the offer is not forthcoming, they question the integrity of the Program, false hopes are built, etc. If a registrant has been counselled properly on geographic mobility, types and grades of positions for which available (the gaining activity must assume so), then the gaining activity must assume also that the registrant is still available and interested.

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In such an inquiry th. . is no basis for deleting registrants who indicate they are unavailable since no offer was made. Any practice of telephoning a releasing CPO or making an offer to a registrant is not consistent with the spirit and intent of the Program The proper approach is to state that you have a vacancy, a resume, and are making an offer, otherwise, the alternative is a qualifications dispute. If a qualifications dispute is determined as appropriate by the requisitioning activity, that fact should be stated to the registering activity early and not following an offer. Once the offer is made the registrant has 24 hours to accept or reject it. A registrant is entitled to one offer only, then is deleted from the system whether or not it is accepted, except for those types of offers that are not considered as 'valid offers' for the purposes of the one offer policy. For the most part, such an exception would involve a significant change in working conditions. These include jobs requiring mobility agreements (unless the registrant is already serving under one), requirements to purchase personal tools, jobs requiring extensive travel, isolated locations, etc. (See 1400.20-1-M for full definition). Normally, the new employee should report within 30 days (45 days for overseas registrants). Offers to overseas activities may be protracted by delays in the electronic message process, but replies should be received within three to five days.

Audit Trails   Clear audit trails are a vital and necessary part of maintaining the image of objectivity, clarity and openness in the PPP, and to assure consonance with the automated program. DoD 1400.20-1-M does not prescribe a fixed form or method that individual activities must utilize in maintaining their clear audit trail or in their internal control or audit process. Included in this manual are some checklists and procedures that have worked well for others, but must be viewed pragmatically by potential users in relation to their unique circumstances. Neither does DoD require that there be a local written operating procedure for the PPP, although Zone or Theatre instructions may require them. The results of the audit are what determine a need for tight local controls or local supplements to DoD 1400.20-1-M. Controls and procedures are for the use and success of the activity and not to please an outside auditor. However, a program that exhibits problems in compliance and has violations often has equal difficulty in reconstructing actions. Activity size is often a determinant, e.g., an activity with one or two staffing specialists and few hundred employee does not have the same need for written conrol procedures as one with large numbers and thousands of personnel actions each year. Users should be thoroughly familiar with the policies and procedures applicable to the PPP before using these Guidelines and are cautioned not to jump to conclusions, but to follow the audit trail of what may appear to be questionable actions and practices to factually supported findings. Detailed checks and follow-through may be necessary on what appears to be a violation. For example, filling of a vacancy by merit promotion while a Priority 1, 2 or 3 skill is shown on the Stopper List gives rise to questions; but may or may not actually be a violation.

EVALUATION METHODOLOGY

Prior to conducting an audit there should be a determination of purpose:

(a) Regular cyclic reviews.
(b) Problem oriented - general or specific.
(c) Complaint oriented.

The methodology for the above types of audits will not vary significantly although quantity as well as reporting should. These Guidelines are appropriate for a complete audit but may be used also for partial reviews. In preparing, there should be a review of available statistical data on the number of PPP requisitions for a given period, the number of offers and acceptances; also a review of the outplacement activity including the number of offers and acceptances. This is an indication of counselling effectiveness.

An audit will have a two-sided thrust for each activity:

    (a) Registering   (b) Gaining

The method of review of each is contained in the inclosed inspection appendix checklist but each has a critical inference. Gaining is stressed as a direct correlary to "making placements" while proper registering and counselling are the cornerstone to a smooth running system. An improper or faulty registration is most often the first step in a poor or a problem placement for someone else.

The auditor should review the activity's merit promotion plan and the exceptions authorized therein. While the PPP authorizes exceptions for such promotions as gradual accretion, etc., a high number of those type actions may have a net result of limiting placement through the Stopper Lists, and should be included as a proprietary type action to be reviewed.

SAMPLE SELECTION

The selection of the audit sample should remain flexible in size. The auditor should not commit to a set number or type of actions to be reviewed. Initially the review should concentrate on those areas and actions most likely to be productive in offering opportunities for program improvement. These include promotions, reassignments, etc., that are prohibited by Priority 1-2-3 registrants. Following that might be a review of reinstatements vs. priority registrants, and then a review against the Stopper List of the list of temporary positions and temporary employees occupying permanent positions. Many of the errors occur in those areas. Avoidance of the Stopper List is more frequently related to improper selection of option codes, withholding personnel action requests (SF 52), changing the position when it is found to be blocked by the Stopper, etc. The auditor must have an open and objective attitude to allow the audit findings to guide the length and breadth of sample. In some activities a review of one month's promotions may suffice for that type action while another activity may require a review of a 12 month period or longer before the picture is clear. An experienced auditor should be able to ascertain where the trail is leading and follow it to its natural and logical conclusion in an organized manner without adding strictures of unnecessary formality.

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TRACING REFILL ACTION

Tracing the chronolgical journal files of separations, titles, grades and position numbers of positions vacated over a given period of time can be an identifier. CPO records will show whether or not a SF 52 has been submitted within a 'reasonable' time to refill a given position. If not, it will be necessary to determine the cause for delay in the submission of a request for replacement. There may be many good reasons for not submitting promptly a refill action, but to avoid making an offer to a PPP registrant is not an acceptable reason. If a SF 52 for replacement is not submitted over an extended period of time when matching skills are shown on the Stopper List, it will be necessary to determine to the extent possible whether or not the refill action was delayed deliberately to avoid making an offer to a registrant. Without persuasive reasons to the contrary, the activity could be found in noncompliance. The activity is responsible for explaining the rationale when evidence indicates a potential violation. When there is a committee established to review manpower or grade or space allocations there may be delays inherent, but they should not be excessive. The review should determine if SF 52's are held or released by that group in relation to the Stopper List or other variables. Time flow processing is a part of any review.

A careful check is to be made for practices of "classifying or changing positions around Stopper Lists" such as upgrading, downgrading or changing series of a position when registrants are available. The auditor must make a differentiation between "when" and "because" in an action. But, in all cases, the activity must show rationale... not the auditor.

The CRA provides reports for investigation to the Zone Coordinators of any changes, cancellations or delays which are identified after a requisition has been submitted. It may prove beneficial to the evaluator to determine whether or not the Coordinator structure has questioned actions or practices of the CPO in the past, and the results of reviews of "Questionable Report Actions."

OPTION CODES

Option codes should be identifiable and preferably exhibited on one of the audit trail documents. Consistency between the options on one position and similar positions should be checked along with the reasonableness of the option(s) selected.

TRACING NEWLY AUTHORIZED MANPOWER SPACES

Either the CPO or the manpower office should be able to identify any newly authorized manpower spaces against which no fill action has been initiated. Again, there may be good reasons why a fill action has not been initiated, but the evaluator should review such reasons. The explanation is the respons-

iblity of the activity. If the activity cannot explain such action, there may be potential adverse findings related to that fact, whether or not there is a violation called. Careful review should be made of any process of changing positions from temporary to permanent and back again, particularly if Stopper List registrants were available at the time of change to temporary.

TRAINEE POSITIONS

If a skill is reflected on the Stopper List that matches the full performance level of a position at the activity, that position may not be downgraded or changed. Auditors should review downgrading actions carefully in view of policies on grade control, etc. Special employment type positions, pre-identified as such, may be filled as an exception. Pre-identification is an indication of a planned approach, not something that occurs at the time of the vacancy. An approved OPM training program is the best example of a position that meets an approved exception. When a trainee position vacancy is to be filled, only qualified PPP registrants with the trainee option will be referred. If a position is proposed to be changed to lower grade for hiring under special employment program, such as excepted appointments of VRAs or handicapped, the Stopper List should be cleared at the full performance level at the time of selection and need not be checked again at the time of conversion. Auditors should review several such positions to evaluate the process.

REVIEW OF INTERNAL PRACTICES

A check is to be made to identify any internal operating procedures or practices inconsistent with the spirit and intent of the Program whether or not intentional, such as:

Delay in Matching, Requisitioning or Making Offers   The word "prompt" is spread throughout the policies applicable to the PPP. It means immediately, at the first opportunity move to action. As soon as a new Stopper List is received, all SF 52's on hand in the Staffing Branch are to be matched against the skills; and as other vacancy SF 52's are received, they too are matched immediately against the Stopper List. As soon as a match occurs, a requisition is telephoned to the CRA and as soon as resumes are received, the process of making offers begins.

Requesting Standard Forms 171   Requesting SF 171's for use in addition to the resumes is not authorized. In practically all situations, sufficient information about qualifications can be obtained by telephone with the registering activity. It is recognized that a SF 171 might be required in the filling of growth potential positions where the merit promotion process must be utilized or in the filling of a highly technical, scientific vacancy where specific disciplines must be identified. Zone Coordinator approval is required for the request of a SF 171 in all instances except positions at GS-14 & 15. All variances will be investigated.

Delinquent Report Actions   The number of gaining activity delinquent report actions should be identified.   Delinquent report actions could indicate delaying tactics for the purpose of avoiding making offers to registrants, carelessness in administration, or a need for more control or training.

Interviews   The PPP does not provide for interviews.   If the gaining activity is within the commuting area of the releasing activity and the registrants do not object, an interview may be conducted if approved by the Zone Coordinator.   A deviation from priority order may not be made nor may a qualified registrant be rejected as a result of interview.   Even if approved by the Zone Coordinator and a registrant does not desire to be interviewed, that refusal cannot be used as a reason for non-selection of non-interviewed registrants.

Qualification Disputes   The gaining activity is not authorized to disqualify a registrant without the mutual agreement of the registering activity.   Disagreements on qualifications of a registrant are to be submitted immediately to the Regional Coordinators.   The procedures for resolving a qualifications dispute are outlined in DoD 1400.20-1-M.   The activity's history of qualifications disputes should be reviewed as well as those where there was agreement by the registering activity.   A high incidence of "registrant not qualified per releasing CPO" may be perfectly valid in each case but should be reviewed against job descriptions, especially if the position does not on its surface appear to be atypical to its series definition.

It is emphasized that there are no losers in a qualifications dispute; only winners.   If a dispute is entered into sincerely, there is a decision rendered that either places a fully qualified employee or avoids a poor placement.   In either case, both sides, the system, and the employee all win.

FAILURE TO REPLY

There is no provision in the PPP for a failure to reply to a placement offer from the Stopper List.   If a registrant cannot be located, only the Zone Coordinator can authorize a "pass over" in which case the registering activity will be directed to delete the registrant until he/she can be located.

MAINTENANCE OF REQUIRED RECORDS

All records applicable to the PPP are to be maintained for a period of two years.   Normally, they will be in sequential order.

KNOWLEDGE OF PPP POLICIES AND PROCEDURES

It is considered essential that staffing specialists understand clearly all of the policies and procedures applicable to the PPP.   Each CPO is to have as a minimum one person trained formally in all policy and procedural aspects of the PPP.   Depending upon the size of the installation and the number of staffing specialists or teams, the number may vary upward.   If all or several specialists are charged with responsibility for program administration, then they should be trained as well.   If possible personnel officers should attend

PPP courses, but at least the Advanced Seminar in PPP. Maintenance and currency of skills is important, particularly if a RIF is forthcoming and the activity has not been a registering activity to any extent for an extended period of time. Also, program changes make updating of skills and knowledges a viable training need even for those who use it regularly. In any event. the audit should clarify any training needs and identify the individuals who need it.

CONDUCT OF THE AUDIT

General Approach   The audit may be conducted in a number of ways. The most effective is to begin with a review of SF 50's from the Chronological Journal File and compare them against the Stopper List surrounding the time related to the action.

Generally, it is better to match the personnel actions against the skills and priorities shown on the Stopper List rather than match the skills on the Stopper List against the personnel actions. Because of registration by the state, region, and zone area of referral processes, there may be many skills reflected on a given activity's Stopper List which the activity would not actually use, including skills which don't actually exist at the installation. Even in a spot check evaluation, a sampling of promotions, reassignments, and appointments should be matched against the skills shown on the Stopper List in effect on the date of the personnel actions and several of the preceding Stopper Lists. Checking previous lists help ascertain if SF 52's have been withheld or delayed.

The types of personnel actions of principal interest are promotions, reassignements, appointments, conversions and changes to lower grade. Separation actions are of interest in tracing refill actions. Copies of SF 50's are to be filed not later than the close of the month following that in which the actions were dated. The evaluator should assure that all SF 50's are made available for review. There should be a review of current SF 52's, to evaluate the method of clearing current 52's and those facts compared to the stated or written practice or policy. Any deviations should be noted and evaluated for impact.

Any positions and grade levels filled by any other means while the availability of Priority 1, 2 or 3 registrants are shown on the Stopper List are subject to question unless documentation on the SF 50 is clear e.g., repromotion as an exception. The next step on a questionable action is to determine whether a requisition was submitted. It may be appropriate to review the Official Personnel Folder (OPF) and any other pertinent documents such as the promotion file, if a requisition was not submitted. For example, the promotion file might show ten GS-2010-11 positions filled by merit. The Stopper List for that period might show the availability of 12 registrants, one or more of whom are Priority 1, 2 or 3. While the 10 GS-2010-11 promotion actions should be checked carefully, it is likely that whatever is found in one of the actions will apply to all ten; i.e., there is no violation or there are ten violations. Authorized exceptions are the first logical check once the list of questionable actions has been compiled to determine whether or not the actions were processed as exceptions. The next possibility is that the job was filled under one the of the special policies that are listed as exceptions to the PPP. Generally those things that are exceptions to the

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Merit Promotion Program are exceptions to the PPP. Specifically, the exceptions are: (See FPM and 1400.20-1-M for complete definition)

(a) Career Promotions

(b) Repromotion eligibles

(c)   Certain reassignments/or demotions, such as, RIF, TOF, classification error correction, medical related, etc.

(d) Reassignment of surplus personnel under the same personnel office

(e) Enforceable assignment rights

(f)   Others as approved by the Zone Coordinator, e.g., where no true vacancy exists.

(g) Mass changes

In the interest of expediting the filling of vacancies, the withholding of a sufficient number of vacancies to cover the number of registrants for a particular position and grade shown on the Stopper List, and proceeding to fill the remaining number of vacancies is authorized. When this process is used, it should be documented clearly because the number of resumes received may exceed the number shown on the Stopper List. Whatever action was taken on each resume should be reflected on the CPO copy of the report action for each resume.

Resumes issued in answer to a requisition are issued in numeric order and the last resume will show "End of (number referred) Resumes." While this was designed to assist the users, it aids the auditor in determining the total number of resumes received and if a report action was made on each one. Unless one of the special policies covers the action, a continuing uncommitted vacancy may not be filled except from the Stopper List when fully qualified matching Priority 1, 2 or 3 registrants are available. Neither may it be filled by a temporary appointment when a skill appears on the Stopper List as Priority 1, 2 or 3. Those must be matched against continuing positions that are filled by other than permanent employees (with few exceptions), and those encumbents displaced if the Stopper List registrant is fully qualified and accepts the offer. Likewise, there must be offers to fully qualified PPP registrants in the commuting area when temporary positions are to be filled from outside the workforce.

REFERRAL LISTS

The auditor should be alert to the date a referral list is actually issued to the selecting official. With two exceptions (below) the selection may be made from the referral list without again referring to the Stopper List.

Exceptions: (a) a non-DoD employee cannot be selected without
               again clearing the Stopper List

               (b) GS-13 and above positions may be filled from
               the referral list without regard to the rule
               in (a) above

The auditor should be alert to the date of receipt of Stopper Lists. All
Stopper Lists are mailed on the same date from CRA and should be received and
dated in a predicatable interval by the activity. A deviation in receipt of a
Stopper List should cause a review of referral lists during that period.
While a number of referral lists dated the day prior to receipt of the Stopper
List should alert the auditor to assure there is no backdating of referrals,
it is not an automatic problem. There may be a number of actions that have
been finalized in a bunch to be completed while the Stopper List is clear.
The auditor should evaluate if this is a conscious effort to avoid (delays of
52's while Stopper List is clear than a flurry of activity to beat the next
one), or is a culmination of a normal cycle of work.

INTERROGATION

An audit should include a review of the use of interrogation procedures even
though it is an optional program feature. First it should be determined if
those who are charged with operation of the program are aware of the
interrogation process and its potential impact. The auditor should check
positons filled during a given period of time against Stopper List potentials,
although not necessarily exact matches, and discuss the process on hard to
fill jobs. Credit should be given for use of the process, even if it did not
provide a qualified individual and result in a placement.

EVALUATION OF ATTITUDES

It is recognized that a mandatory program may generate some resistence, but
such an attitude cannot be allowed to adversely affect proper
administration. Any serious lack of affirmative action toward the program
should be identified and corrective action taken locally. To some extent,
attitude can be measured by the degree of compliance, whether or not briefings
have been held with managers, if a statement of affirmative support has been
issued, whether administrators attend training courses, number of
requisitions, etc. The net result (placements) is the most reliable
bellweather. In any event, the auditor should evaluate efforts made to "sell"
the mandatory aspects based upon the postive results achieved in placing PPP
employees who more often display fewer problems and less turnover than new
non-DoD employees.

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QUALIFICATIONS REVIEW

No employee can be registered into the system on the basis of meeting minimum qualifications. Fully qualified is the ability to enter on the job and function without undue interruption to the work process. The orientation period is variable depending upon the job. For example, a warehouseman or motor vehicle operator would require less orientation to the new job than a bench scientist on a new project. In an audit, there should be a close review of registrant's skills presented by the registering activity to assure the individual registrant possesses the requisite qualifications, and of the gaining installation to ascertain if they are reasonable in their presentation of the skills necessary to do their job. The same audit is appropriate to determine if the registering activity is too restrictive.

Poor placements may result from a registering activity trying to "help" the RIF affected employee too much. It does not held to place individuals into positions they can't perform. This is more common in a major drawdown or base closure, more particularly when there are mass registrations, minimal notice periods, non-staffing individuals involved in registration, etc.; hence, an even greater need for staff assistance during that period.

In a major drawdown the auditor should assure that physical qualifications are accurately represented as well as performance factors, including those in jobs requiring performance tests.

FLOW PROCESSING

The auditor should determine if there are any practices or policies that de facto limit the effectiveness of the PPP. One technique an evaluator may wish to use is a flow process chart of SF 52's in relation to the Stopper List to determine if registrants are getting immediate offers following immediate requisitions. Also, there should be a review of the establishment of such things as trainee type positions and career ladder positions to determine if the net result of a policy is to eliminate PPP registrants, even though the intention may not have been to do so.

FORMAL vs. INFORMAL SYSTEM

Auditors should be alert to any local or area referral process (other than that authorized by OPM) that operates outside the PPP. No such system is authorized, it has no legal basis, and will not be allowed to continue.

This does not detract from efforts to outplace RIf effected employees in private industry or other Federal, non-DoD agencies. The auditor should evaluate those efforts along with PPP compliance, particularly when there is a major reduction or base closure.

<u>COORDINATION</u>

Auditors should evaluate whether those who operate the system seek help or coordination when there is an indication it is needed. Also, do they share with other their avenues to success. The manner is which an activity approaches a problem is an indication of their support. Some activities are adamant on only a "perfect match" on the Stopper List being made an offer, even when it appears that a registrant is probably qualified and should be considered under interrogation at least. Some other activities are quick to claim a poor placement and express a desire to return the individual to the original registering activity. Others take a more positive approach and view any problems as opportunities for creative personnel management and seek ways to make the system work better. They attempt to train or place elsewhere locally a marginal placement and seek ways to make more effective placements

<u>OVERSEAS EMPLOYMENT</u>

The Overseas Employment Program (OEP) is a voluntary system on the part of the employee. Evaluation should concentrate in three major areas:

(1) Publicity to the work force
(2) Quality of registrations
(3) Maintenance of registrations

The "success" of the program cannot be measured against the number placed since that is outside the scope of authority of the local activity. Other things being equal they should have a fair share of placements if # 1, 2 and 3 are done well.

Inspections of overseas activities should include a review of their use of the process as a gaining activity. If an overseas activity is not an active user it should be reported as such to assure that jobs for which there will be no fill action are not advertised non-productively at stateside installations.

<u>PLACEMENT FOR EMPLOYEES UNDER GRADE RETENTION</u>

The DoD Classification and Placement Plan for Employees Under Grade Retention applies to General Schedule positions through GS-15 and all Wage Grade positons (except non-appropriated fund - NAF). Auditors should evaluate to determine if the activity is taking aggressive action to place the subject employees locally, as well as to register them properly into the PPP. Regardless of the existence of other DoD activities in the commuting area, all affected employees will be registered. Quality of registration, extended area of availability, etc., are audited the same as a regular PPP registration.

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CORRECTIVE ACTION

The circumstances surrounding violations or incidents of non-compliance are to be evaluated in light of whether or not one or more registrants were deprived of their placement rights, and whether or not any violations or incidents of non-compliance were knowingly committed or were committed inadvertently. Errors not depriving an available registrant of placement are corrected by action being taken to assure no repetition. An error depriving an available registrant of placement must be corrected to the point of making an offer to the registrant. Whether or not a vacant position exists is not the critical factor. If a situation would be created where adverse action would result, the Coordinator structure should be involved to determine if alternative courses are more propitious.

It is important that identification of the cause of error(s) or problem(s) be determined in order to improve performance. Individual violations, system problems, poor placement rates, Stopper List "security", etc., may call for one or more improvement actions. Training for system administrators and/or operating officials, an SOP, a checklist, post audit procedures, central control of Stopper List, and a myriad of other actions may be needed to achieve improvement.

Broadly stated, a violation is an action that results in a failure to apply properly the regulation, or denies or reduces the regulatory rights of an individual. An irregularity is the result of an action that does not follow properly a regulation but does not 'violate' someone's regulatory rights. A systemic irregularity or violation results from a faulty system or process. Whatever it's labeled, correction is required. Emphasis should be on correction to achieve the ultimate objective of the program: rapid placement of fully qualified registrants.

The degree of penalty to be imposed on the person(s) responsible for violations or non-compliance will be determined on the basis of whether knowingly committed or whether the official(s) should have known that a violation was being committed. Any major or multiple violations which reflect a disregard for DoD policies and procedures may be the basis for disciplinary action for those involved including management officials as well as civilian personnel office employees. Component, Zone, and Regional Coordinators may direct corrective actions in violations found. Other inspectors, evaluators or investigators will either direct or recommend corrective actions in accordance with their delegated authority.

It should be emphasized by the auditor, internal or external, that the Coordinator structure desires to assist and not to penalize. Should an internal audit reveal an error beyond the scope of local authority to correct, the activity is encouraged to contact immediately for assistance those in the Coordinator structure. The results will be assistance and not criticism. However, efforts to subvert or conceal an error can only be met with the view of intention.

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Isolation of the cause of a persistent problem or problems may be difficult and require an expanded sample to make such a determination. The correction may include a need for training of one or more people, the need for better top management personal interest, an SOP, etc. The audit will serve little long term benefit without determination of cause and cure. The antithesis is likewise true, a successful operation should be pinpointed on how it achieved its success and that knowledge shared with others.

REPORTING AND FOLLOW-UP

Reporting The format or approach of a report of an audit or inspection of the DoD Stability of Civilian Employment Program should follow the same dictates as the evaluation, i.e., the report should not be strictured to requiring a discussion on the same issues each time, but as the inspector lets the audit lead to a natural logical conclusion, so should the report. The written report should be sufficient to verify the oral closeout report to the appropriate activity officials and touch on successes as well as areas needing attention. Special emphasis should be given to those areas that require attention (regulatorily required), with less on those that are recommendations for improvement. Correction of violations is required. Training of staff members should be a topic in most reports.

Internal audit reports may be distributed as pleases the CPO and Commands, but external audit reports, as a minimum, should be distributed as information to the Coordinator structure of the subject activity.

Follow-Up Inspections that describe a problem situation should have follow-up action to assure correction of the existing problem and elimination of future ones as well, when possible. The follow-up may be accomplished by a reporting requirement on what has been done to implement findings, recommendations, and requirements, or an on-site visit at a later date to assess progress in program administration. The results of a follow-up visit should display an improved situation; but if not, should be considered in a more severe view than the first visit. Auditors should always be aware of external factors beyond the control of the activity that may affect success and should consider those in the evaluation of results. However, there are no external factors that require or allow violations. Violations are caused by accident or intent, both of which are correctable, the cause of which should be isolated for positive identification and correction whether it's an individual or a process.

INSPECTION/STAFF ASSISTANCE FUNCTIONS

In a major drawdown or base closure the Coordinator structure has a vital and immediate role in assisting during the orientation and registration period including evaluating the quality of input into the PPP. The audit/staff assistance role becomes combined at this juncture to assure proper registrations (pre-audit), and thus help avoid problem placements on the gaining end. In addition, it offers the Coordinator structure a unique opportunity to observe the results of training efforts being utilized under trying conditions, thus evaluating the effectiveness of training and the courses themselves.

INSPECTION CHECK LIST

PREREQUISITE SKILLS

Any individual assigned to inspect and evaluate the operation of the Program for Stability of Civilian Employment must possess the requisite body of regulatory knowledge, know the spirit and intent of the program, display the capability to administer the processes, and demonstrate the ability to evaluate objectively against a set of criteria that embodies the aforementioned skills, knowledges, and abilities.

Those who utilize the checklist as an internal guide must be aware that the Check List is a guide to policy and does not alleviate the necessity to return to the basic DoD 1400.20-1-M for policy itself on the issues.

GENERAL POLICY & SUPPORT

GUIDE QUESTIONS	EVALUATION CRITERIA
1. Have employees responsible for PPP operations been trained?	1. CPO employees responsible for the Program should have recieved appropriate formal training and instruction. Provisions should exist to train new employees assigned the function. They should have attended Basic and Advanced PPP courses, or if recently assigned should have definite plans to attend. Other training and orientation including OJT should have been provided. Individuals assigned recently to perform PPP functions who attended training years before should attend again if they have not kept current in the intervening period.
2. Do those responsible for the program possess the body of knowledge necessary to perform successfully the duties related to PPP and the Stability Program?	2. Performance and results are the primary evaluation criteria. They should know current program status, how it reached this point, and where it is going from here in relation to the local activity role. They should be conversant on specific policy issues and demonstrate the ability to locate policy in the manual. Personal interviews on the PPP processes should reflect adequacy of knowledge on the part of CPO staff members. The compliance review should provide prima facie evidence of knowledge via performance, more so than whether the technician can cite policy from memory. Knowing where to find policy in the manual and using that correctly is a principal evaluative concept.

GENERAL POLICY & SUPPORT GUIDE QUESTIONS	EVALUATION CRITERIA
	The evaluator should compare three areas of: (1) How it is written (the regulation) (2) How it is said to be done (the oral policy) (3) How it is done (the actual process). This comparison can give insight into correction if all three aren't the same.

3. Are all instructions, regulations and manuals pertaining to the agency and DoD Program for Stability of Civilian Employment maintained?

3. DoD Manual 1400.20-1-M and DoD Counseling Manual 1400.20-2-M with all changes thereto, and the appropriate component publications, if any, must be up-to-date. Out of date or missing regulations create unnecessary and unknowing irregularities and violations.

4. Is there evidence of management support and knowledge of the PPP? Has publicity been disseminated to all employees? Is the Commander of the installation briefed periodically?

4. All activities should have indoctrinated supervisors and managers on the operation of the PPP. Employees should be aware of the Program and the benefits to them in the event they are scheduled for RIF or base closures. (This is related to their acceptance of PPP placements in their organization). There should be evidence that the PPP is covered in supervisory development courses or similar training programs for both managers and supervisors. Publicity should be given to the effectiveness of the Program and the results of the Placement surveys

5. Is there evidence of utilization of the coordinator structure in program operation and problem resolution?

5. A positive or negative finding should be directly proportional to whether problems existed that should have been coordinated and were not. Coordination for it's own sake has no purpose.

6. Is there evidence of prompt response to Regional and Zone Coordinator inquiries and decisions?

6. Documentation should reflect action taken in response to Coordinator inquiries and decisions.

7. Are there published operating procedures for matching vacancies and continuing, uncommitted positions occupied by temporary appointees, temporary promotees and reemployed annuitants against each Stopper List?

7. Any written procedures should be reviewed for need and adequacy. There is no DoD requirement for an internal written SOP, but if the inspection results show a need one may be necessary. Often, fragmentation or disorganization of the PPP is better corrected by centralizing all SF 52's cleared through one person.

8. Have key management officials and supervisors been briefed on the provisions of the DoD Program for Stability of Civilian Employment? Do manager and supervisors support the program?

8. It is intended that supervisors will be knowledgeable on the policies and procedures and that each Commander will be briefed adequately on the key and mandatory features of the Program. An assessment of program support should be related to both word and deed.

9. What is the date of the last ment of support issued by the mander? Is it current?

9. This statement is to be issued at each change of command to assure visual support by the current Commander. Small serviced activities (less than 50) may be grouped under a master support statement, as an exception, if approved by the Zone Coordinator.

10. Has the activity conducted a self-evaluation of its DoD Program for Stability of Civilian Employment?

10. There should be some evidence that this guide or other methods have been used to evaluate compliance with the DoD Program. Results are the desired outcome; thus, outside evaluation should concentrate on:
(1) Quality of Audit, and
(2) Program impact.

11. Has the activity taken corrective action when internal review reveals a violation or systemic problem?

11. Corrective action may range from training of responsible individuals to disciplinary action for those who do not comply. Corrective action for registrants who are not made offers when entitled include making such offers in arrears if the registrant was placed at a lower grade than that which was not offered as required. Assistance within the coordinator structure may be a factor if it was needed and not requested. The timeliness with which corrective action is taken as well as the circumstances (voluntary or required) are indications of Program support.

12. Is the activity aware of the function of the Coordinator structure?

12. A releasing activity should have some evidence of contact with the Coordinator structure and of any special operating procedures applicable to that Zone. Coordinator's monthly reports should be on file.

13. If there has been or is about to be a RIF or TOF, was/has advance planning been accomplished satisfactorily?

13. Action should have occurred well in advanced of the event in matters such as informing employees, et. al., stockpiling vacancies, early out requests, earmarking of funds, planning out-placement efforts (Govt. and non-Govt.), retraining possibilities, advance notice requirements, etc. Quality assesments of plans and results achieved should be made.

14. Are those responsible for the program familiar with fiscal policies involved in travel and pay fixing?

14. Personal interviews and the SF-50 chronological journal file review should be sufficient to determine quality levels. Correspondence at a gaining activity should be reviewed to determine application. They should be thoroughly familiar with pay retention, salary adjustment, highest previous rate, and other rules.

15. Are they aware of the function and operation of special authorities granted by the Office of Personnel Management (OPM)? Are they applying them as needed?

15. A review of actions involving making and renewing temporary appointments, issuance of RIF notices, liquidation procedures, waivers of qualification requirements, and displacement of overseas limited employees will give an indication of knowledge and application.

16. Has the activity made proper use of the continuing or non-continuing definition of positions? Are performance tests, physical qualifications, and sick leave retention authority administered properly?

16. Documentation should exist on whether a position is continuing and show in the audit trail. As a registering and gaining activity there should be evidence of attention to assuring proper matches of stopper registrants and positions. An employee should

not be registered unless able to
perform both physically and
professionally. Employees disabled
due to illness or injury should not
be registered for a skill unless
able to perform fully within 30 days
of any possible selection.

17. Does the activity give proper
consideration to repromotion
eligibles? Is the consideration
automatic or must the eligible
apply? Does it impact on PPP
placements?

17. Employees receiving grade, pay,
or salary retention benefits due to
involuntary placement in lower grade
positions will be given special
consideration at their activity to
positions having a target grade at
or below the grade in the pay group
from which demoted. Repromotion
within the employee's current
activity may be made as an exception
to the requisitioning requirements
for Priority 1, 2, or 3 PPP
registrants.

Stopper list requisitions should be
done at the time the vacancy occurs
regardless of the existence of a
repromotion eligible unless it is
clear from the outset (in an
individual case) that a repromotion
eligible will be the selectee.

18. Have any hiring freezes been
imposed? Administered properly?
DoD and Zone Coordinators notified?
PPP optimized?

18. When a hiring freeze is imposed,
DoD and the Zone Coordinator must be
notified. For the most part,
locally initiated freezes are not
recognized as having any effect upon
the PPP. There should be
communication with the coordinator
structure if a freeze will impact on
Stopper List placements.

19. If major RIFs or drawdowns have
occurred, did they apply properly
the candidate activity provisions?
Freezes on permanent promotions?
Stockpiling of vacancies?

19. Failure to apply these
provisions properly could result in
a Stopper List placement being
affected by RIF again in a short
time, and for promotees to be placed
elsewhere shortly after they
received a promotion into a position
that had a known termination date.
Activities should display evidence
of early involvement of the
coordinator structure in those type
of situations.

20. Is PPP responsibility centrally controlled or spread among several people? What is the impact.

20. There are no requirement that the PPP be managed by assignment of responsibility in one specific manner. Whether the activity chooses to centralize oversight into one individual or have several responsible for their areas (such as staffing specialist or team leaders), the results are the most important criteria. Often, a large installation will find it more conductive to control by centralizing responsibility while a small activity with 2 or 3 staffing specialists (or less) may have no need for those type strictures.

21. Is Stopper List "security" adequate? Is it retained on a "need to know" basis? Does excessive circulation compromise the flow of SF 52's?

21. While the Stopper List has no security classification it should not be circulated freely. A more frequent finding where a Stopper List is open for review by the entire CPO and managers is a delay in SF 52's, possible changes in jobs, etc., when a match appears on the Stopper List. Normally the "need to know" should not extend beyond those responsible for actual administration. Likewise, specific discussions with managers of what is on the current Stopper List in the absence of a SF 52, is an indication of too loose an operation. The evaluator should be alert to delays in vice-actions.

GAINING ACTIVITIES

1. Are all vacancies matched against each Stopper List and requisitions submitted as required without delay in accord with priorities of registrants?

1. This is a major thrust in the PPP. The auditor should review the audit trail for timeliness and consistency. The personnel actions being effected would have originated some time before the effective date and should be matched against the current Stopper List and several preceding Stopper Lists. Check the date the referral list was given to the selecting supervisor, and check against Stopper List receipt dates to assure no back-dating of rosters. Check Stopper List receipt dates for consistency (usually 4 or 5 days from CRA mailing), and if one or more are later, check SF 50s carefully against that Stopper (for avoidance).

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2. Is a 2-year file of properly sequenced Stopper Lists maintained? Dated upon receipt?

2. One copy of Stopper Lists, Priority Placement Resumes and Unmatched Vacancy Requisitions should be maintained by date for a two year period.

3. Have placement offers been made in the proper priority order?

3. Offers must be made successively to employees in Priority 1, 2, 3, 4, and 5. Priority 1 registrants are to be considered prior to Priority 2, Priority 2 before 3, etc. Normally, the sequence of offers within each priority is:

a. Commuting area)
b. State   ) Precedence
c. Region   ) to own
d. Zone   ) component
e. Outside Zone   )

Gaining activities may make exceptions to geographic order of precedence when the registrant more distant is clearly superior in qualifications. Gaining activities may NOT deviate from the sequence of order of offers among priorities.

4. Are users familiar with priorities and exceptions to PPP? Are all offers made in priority order? Have requests for waivers been processed properly?

4. Certain exceptions from the Priority 1, 2, and 3 restrictions on promotions and reassignments are specified in DoD Manual 1400.20-1-M. Some type of documentation in the audit trail, such as a notation on an SF-52 indicating action taken with regard to the Stopper List or exception to the Stopper List should be in evidence. Waivers should be reviewed against the overall PPP placement rate to assure propriety in a lengthy time frame. While each waiver may stand alone, an overall review should show a better picture of installation action vs PPP, e.g., whether efforts are made to make placements in lieu of waivers being requested.

5. Are option codes being utilized properly?

5. The "From" and "To parts of the SF 50 will show the position title, series, grade and position numbers. The titles may or may not have options, but some options used in the PPP are actually position

titles. The audit trail documents should display options used to recruit, and that should be checked for consistency with similar positions as well as for realistic selection of options. Be aware that some activities may use options improperly to avoid an "exact match". If there is no appropriate option listed in the Manual, the series is prevailing regardless of the position title.

6. Is the staff aware of the procedures for resolving qualification disputes? Are they being administered properly?

6. The very nature of the PPP can lead to disputes between releasing and gaining activities as to the qualifications of a particular registrant. When a dispute is entered into in good faith there are no "losers". If the gaining activity disputes qualifications and is found correct they have avoided a poor placement. If the gaining activity disputes qualifications and are found incorrect they have made a good placement more assured. There should be few disputes that reach the Zone or Component level. A high number of disputes should prompt a review of too strict or specialized qualifications, and possible efforts to avoid Stopper List placements. The registrant must be "fully qualified", not necessarily better qualified than other candidates.

Normally, disputes can be resolved easily and quickly within the Coordinator structure and the gaining CPO should be thoroughly familiar with the process.

7. Has the activity ever waived qualification requirements in order to make an offer to a registrant?

7. Maximum use should be made of the authority to waive qualification requirements for displaced employee registrants, particularly Priority 1's. Any such incidents should be looked upon as positive support by the gaining activity.

8. Has the releasing CPO been
contacted within a reasonable time
after receipt of a resume?

8. Contact the first day after
receipt of a PPP Resume is
reasonable. There should be
documentation of the offer and to
whom made. A careful check should
be made as to intent when delays are
found.

9. Are vacancies being filled by
merit promotion action while skills
are shown on the Stopper List? Was
the referral list forwarded to the
selecting supervisor while the
Stopper List was clear?

9. Such actions are authorized
without further consideration of the
stopper list with one exception.
Selections of a non-DoD employee may
not be made at GS-12 and below if a
new Stopper List which reflects a
registrant is received before the
selection is made. The date the
merit promotion listing was
forwarded to the supervisor is
controlling. Any backdating or
other erroneous listing of dates
should be considered violations of
DoD policy. Also check for delays
in selection and requests for more
candidates.

The "Remarks" section of the SF 50
may have a statement or statements
which describe the nature of action;
such as, "Career promotion or non-
competitive repromotion to grade
previously held, etc." If there are
a large number of career promotions,
this should be reviewed for
propriety. Also, individual actions
should be documented.

10. What is the time span between
receipt of Stopper Lists and the
matching of existing vacancies
against these lists?

10 Immediately upon receipt of the
Stopper List, vacancies on hand
should be matched against the
List. As other vacancies are
received, they should be matched
immediately against the current
Stopper List. Check Stoppers for
consistency of receipt from CRA
(usually 4-5 days). (See #1
'Gaining' above).

11. Is a listing of all temporary appointees, temporary promotees and reemployed annuitants in continuing, uncommitted positions available and up to date?

11. Without some type of listing of positions, it is possible that they are not matching them against each Stopper List except at very small activities where one or two staffing specialists know all the positions to which application should be made.

A finding that no specific individual has been designated to make the check should raise additional questions as to how these functions are performed. If there are no violations or program discrepancies, the auditor should not require a specific method of operation to satisfy the auditor. The proof of effective operation is compliance and placements.

12. Are requisitions telephoned to the CRA when skills reflected on Stopper Lists match continuing, uncommitted positions filled by temporary promotees, or reemployed annuitants?

12. Any PPP registrant, regardless of priority, will displace temporary appointees occupying continuing positions. Also, the Stopper will be matched against any temporary appointee, temporary promotee, and reemployed annuitant occupying continuing positions and they will be displaced by Priority 1-2-3 registrants. Displacement of the temporary appointees, temporary promotees and reemployed annuitants should be effected only after firm acceptance by the registrant. Requisitions are phoned immediately to CRA the same day as a match occurs unless an exception is apparent or a waiver will be requested, also immediately.

13. Have continuing positions been canceled or reclassified to preclude requisitioning from the Stopper List?

13. A review of continuing positions that have been reclassifed or canceled could be made. Also, there should be a review of all SF 52s that have been returned to the operating organization without action. (Most personnel offices have a SF 52 log book that can be utilized for that purpose.) A check of the appropriate Stopper List with the positions should determine

if the action was taken to preclude the making of offers to registrants. If so, this would be considered an intentional violation. The auditor must review carefully in this area to assure that a proper decision in a natural sequence of events does not coincidently appear as a violation. The activity is responsible for providing rationale to justify a decision of propriety.

14. Are there positions filled previously by temporary appointment that have been changed to permanent appointment at a time when the Stopper List became clear?

14. The filling of a continuing position by a temporary time-limited appointment and then changing it to a permanent type appointment at a later date is prohibited if done to avoid placing a PPP registrant. Any such event should be investigated carefully and positive action taken to correct.

15. Have any higher graded positions been changed to trainee level positions or re-engineered to lower grades for recruitment, then upgraded at a later date? For special employment programs such as VRA, Upward Mobility and Handicapped?

For what purpose?

15. Positions are not be changed to trainee levels (unless preidentified), when a fully qualified registrant is available at the full performance level. Neither are positions to be downgraded for grade de-escalation purposes when full performance registrants are available. A special employment position must be cleared with the Stopper at the time of initial hire, but not at later conversion. The auditor should evaluate to determine if the VRA, etc., is being utilized to avoid the Stopper List.

16. Does the activity have civilian positions at remote locations?

16. Remote locations with 50 or more civilian, full-time continuing positions should have assigned activity codes other than "A" and those assigned codes covered by a Stopper List mailed to the servicing CPO. Requisitions must be submitted to cover vacancies at other remote locations to determine whether or not registrants are available.

Requisitions must be submitted at the beginning of each calendar quarter to determine the availablility of registrants to displace any temporary promotees or reemployed annuitants at unnumbered remote locations.

During the recruitment process the servicing CPO should match requisitions against activity codes in the commuting area of the vacancy not covered by a Stopper List. When more than one DoD activity is in the commuting area, the activity with the largest number of skills matching the vacancy will be used.

17. Are activities with vacancies for which skills do not appear on the Stopper List familiar with the interrogation process and has it been used for recruitment purposes?

17. Activities with vacancies for recruitment should be aware of the listings of skills of surplus employees available from the CRA through the interrogation procedure.

Often a registrant for one skill will meet the qualifications standards for other jobs with similar qualifications requirements. If the activity has a strict adherence to a "perfect match" rule, check carefully for evidence of misuse of options, inconsistent options, loopholes, etc. While "perfect match" may not result in violations, it may have a net result of few placements. The evaluator should be attuned to any evidence of nonsupport when viewed in its totality against similar activities regardless of location, as well as other activities in the same geographical area. Use of interrogation for recruitment is a positive attribute. In planning for a major RIF, activities can determine by interrogation the types of skills currently on the Stopper, requisition activity, and other data of value in planning the registration of local employees affected by RIF.

GUIDE QUESTIONS EVALUATION CRITERIA

18. Are resumes returned within 20 workdays to the CRA indicating action taken?

18. Review file copies of resumes. Circumstances may preclude returning them within the 20 workday time period. Resumes held longer than 20 workdays should be extended by contacting CRA. Such factors as number of vacancies existing, number of employees referred and number of activities contacted should be taken into consideration.

Overdue and questionable resumes should be reviewed to determine trends, if any.

19. Does the activity have a Reemployment Priority List (RPL)? Displaced Employee Program (DEP)?

19. The availability of RPL and DEP registrants may modify slightly the order of displacement of temporary appointees. Check for adherence to order of selection.

20. Does the gaining CPO employ any practices in the management of the PPP which are not in accord with the spirit and intent of the program?

20. For example, such practices as mentioned above, including unexplained delays in working resumes, requesting SF 171's, cancellation or reclassification of position after resumes are requisitioned, imposing unusual or excessive qualification requirements, and requiring interviews of registrants, are not in accord with PPP policies. The auditor should be alert to assure that policies that have been promulgated do not have the net result of limiting Stopper List placements, even if the policy itself meets the letter of the regulation.

21. Has the activity complied with all directives of DoD and the Zone Coordinator? Were prior program recommendations adopted? Other changes in administration that have the same effect as outside recommendations for improvement?

21. Evaluate the knowledge and performance of the CPO and staff on implementing restrictions on appointments or promotions imposed by outside authority and the compliance therewith. Evaluate the net result of program improvements that resulted from requirements and recommendations from audits. Analyze the cause of improvements/ stability/decrease in effectiveness.

GENERAL POLICY & SUPPORT
 GUIDE QUESTIONS   EVALUATION CRITERIA

RELEASING ACTIVITIES

1. Are priorities being assigned in accordance with the DoD Manual?

2. Are employees informed on the PPP? Is there evidence of publicity directed toward employees and management?

3. Does the activity have a time-phased plan for counseling employees based on a scheduled date of RIF or closure? Is follow-up counseling conducted 30-60 days following registration? Continuing follow-up on longer term regis-trants?

4. Is documentation being maintained on each registrant reflecting all offers, declinations and employee's choices as to grades and locations?

1. Definitive priorities are outlined by the DoD Manual 1400.20-1-M. Corrective action on a negative finding is required on any violation. If the registrant has already been placed the type of correction is contingent upon whether the individual suffered harm. Attention should be given to priorities assigned to individuals at the first notice RIF letter and any file maintenance when later offers may affect their priority.

2. Evidence of publicity such as articles in periodic newspapers or newletters, group or individual training sessions, and/or management indoctrination sessions should be used to determine extent and effectiveness of publicity. The amount of publicity should be related to the stability of the activity , i.e., increase significantly in periods of RIF.

3. A written time-phased plan including numbers and types of employees to be registered, based on scheduled impact dates, should be available.

There should be direct evidence of counseling of registrants, including their signature on a counseling form. There should be evidence of counseling on mobility and availability (including grades and skills) for those who have not been placed within a reasonable time. Primary attention should be directed to higher priority registrants.

4. A documentation file for each employee registered should be maintained. It should include any statements from the employee as to choices of location, grade, declinations and changes in registration data.

5. Are registrants who are placed
or who decline job offers promptly
removed from the PPP? Are they
promptly removed from the Program
when not available for referral for
other reasons?

5. Documentation should reflect the
fact that necessary information to
remove the registrant from the PPP
was telephoned to CRA within one
workday after placement or
declination of a suitable job offer,
or when it was determined that the
registrant was no longer available
for referral for other reasons.

6. Were employee's skills and
qualifications rated correctly?
Registered properly?

6. It is not sufficient that a
registrant merely meet minimum CSC
Handbook X-118 or other appropriate
Civil Service Standard for each
skill listed for referral. To be
registered he/she must be "fully
qualified" which is more than
minimum. A waiver of qualifications
by the registering activity is not
permitted. Waivers of qualifi-
cations by gaining activities is
permitted and encouraged.

7. Were the skills for which an
employee was registered available at
the activities selected by the
employee?

7. DoD Counseling Manual 1400.20-
2-M provides a skills index by
activity. While all skills of a
registrant might not be available at
a specific activity, evidence should
exist that the Counseling Manual was
used to guide employee selections
and that they afforded reasonable
opportunity for placement. When a
Zone, State or Region is selected as
the area of registration, rather
than individual activities there
will be non-matches in the course of
events. If the registrant is in a
scarce skill that exists in but a
few locations they should be
registered accordingly rather than
appearing on all Stopper Lists
unnecessarily.

8. Are option codes being used to
depict skills properly, but without
restricting unnecessarily or unduly
the registrants opportunities for
placement?

8. Option codes are designed to
streamline the PPP and avoid
unnecessary requisitions of
registrants obviously not qualified
for the gaining activity's position.

GENERAL POLICY & SUPPORT
GUIDE QUESTIONS   EVALUATION CRITERIA

Excessive specialization,
particularly at lower grade levels,
should be reviewed carefully for
propriety and realism. If local use
of option codes appear to restrict
placement opportunities the auditor
should assure training of those
responsible for registration and
correction of any errors found.

9. Are the registrant's resume   9. One workday is considered
audits being reviewed to insure   sufficient time to submit file
correctness of data? Are changes or   maintenance after a change is
corrections being submitted to the   determined necessary. To determine
CRA promptly?   the amount of time used, a check of
                                           the date on the Resume Audit from
                                           the CRA which implemented the change
                                           should be compared with the
                                           documentation file on the employee
                                           maintained in the CPO.

10. Does the releasing CPO employ   10 Such practices as referring
referral practices in management of   gaining CPO officials directly to
the PPP which are not in accord with   employees to make a placement offer,
the intent of DoD policies?   not replying or not replying
                                           promptly to placement offers, and
                                           allowing registrants to establish
                                           their own area of referral without
                                           guidance and direction of a CPO
                                           official are examples of procedures
                                           not in accord with policy.

11. Is the CPO determining properly   11. The area of referral should be
the area of referral? Are inter-   no greater than that necessary to
zone exceptions granted properly?   effect a placement within the
Compassionate exceptions?   available time frame. This will
Are activity selections outside the   vary depending upon the type of job
releasing Zone approved by the Zone   and grade level. The auditor shuld
Coordinator? Are criteria or guides   be alert to undue restrictions,
available for determining which   excesses, and inconsistencies.
skills should be expanding outside
the releasing Zone?   Documentation is necessary from the
                                           releasing Zone Coordinator unless
                                           the Zone Coordinator has provided
                                           other guidance. Local activities
                                           may not authorize registration
                                           outside the Zone in which the
                                           registrant is located physically,
                                           and must request such through the
                                           coordinator structure. Some

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criteria should be available such as
type of skills for which vacancies
are limited within the releasing
zone. Another factor would be the
separation or base closure date
which could be used in determining
if referral should be made outside
the releasing zone.

12. Is the releasing activity aware
that eligible employees must be
registered for all activities within
their commuting area? Are mandatory
registration policies being invoked
properly?

12. Every eligible employee
scheduled for RIf related separation
will be registered for his/her
current pay group, series, and grade
for activities within his/her
skill, and for up to five skills for
which fully qualified. "Personal
commuting area" decisions should be
reviewed for reasonableness and
consistency.

13. Are prompt replies being given
to gaining activities concerning
acceptance or declinations of job
offers?

13. Documentation of all telephone
contacts and other written documents
should be available for each
registrant in the PPP. It should be
determined how long the employee was
given to accept or decline an
offer. Reasonable time for a reply
is 24 hours, but may extend slightly
under extenuating circumstances. It
is emphasized that an immediate
reply is necessary and considered
important to the success of the
program. The employee is not
allowed the opportunity to go "job
shopping" by delaying a reply to
allow for more offers to arrive or
to decide between offers. The
registrant should be presented with
but one offer, as determined by the
CPO; that being the first to
arrive. If more than one arrives
simultaneously, the better offer
would be appropriate to present to
the employee.

14. Are placements of registrants reported correctly? Promptly?

14. The auditor should assure that action is taken in an immediate manner. Delays cause duplication of effort by the CRA and the gaining activities.

15. What is the time span involved for employees selected for positions in a different organization or activity? Are delays avoided whenever possible?

15. The employee must be available for prompt release when registered in the PPP. Two weeks to 30 days is considered the normal period for release from activities scheduled for closure, if the employee is prepared to report that quickly, but individual circumstances must be considered in that decision. While 30 days is the normal period to report where PCS is involved, 45 days is acceptable for overseas PCS returnees.

16. Are DD Forms 1817, Registrations, being submitted promptly to the CRA, or is the CPO stockpiling registrations?

16. Registrations should be submitted to the CRA as soon as completed. In a major RIF the registrations should be submitted daily so that referral can begin immediately. Stockpiling results in unnecessary delays.

DOD PLACEMENT PLAN FOR EMPLOYEES UNDER GRADE RETENTION ("R" PROGRAM)

GENERAL POLICY & SUPPORT

GUIDE QUESTIONS	EVALUATION CRITERIA
1. Are those responsible for implementation and utilization thoroughly familiar with the provisions of the plan?	1. An interview with those assigned responsibility plus the personnel officer should indicate knowledge. A review of registrations, referrals, and placements will show how the system is operating and its effectiveness.
2. Are all eligible employees registered? Skills and grade level considerations maximized?	2. All affected employees must be registered. There should be procedures in effect to identify positions and people affected by the "R" program. Employees will be registered for up to five skills for which fully qualified at their retained grade.
3. Is the area of availability delineated properly? Expanded in accordance with installation size and geographic location?	3. Assure that initial registration and expansion follows the guidelines. Check for Zone Coordinator authorization on DoD commuting area wide registration.
4. Are retained grade employees afforded local placement consideration properly? Do user understand the "R" designation?	4. The audit should determine the priority of offers under the "R" program and if the "R" and repromotion plans are being followed.
5. Has there been a review of potential impact of "R" placements on EEO?	5. If a placement under the "R" program would result in severe adverse impact upon affirmative action goals, the Zone Coordinator should be asked to assess the impact and authorize exceptions as warranted by the facts.
6. Are users familiar with loss of "R" privileges? Are they taking action properly?	6. Offer of placement of a fully qualified "R" registered employee is mandatory. Declination of a valid offer will result in loss of entitlement.

DOD OVERSEA EMPLOYMENT PROGRAM (OEP)

GENERAL POLICY & SUPPORT
      GUIDE QUESTIONS   EVALUATION CRITERIA

A.   Releasing Activities

     1.   Has the OEP been publi-   1.   The OEP should be publicized in
cized to the work force on a   activity media. Enough information
continuing basis?   should be disseminated to enable the
                                        interested employee to determine
                                        eligiblity or ineligibility. Each
                                        technicial staff member in the CPO
                                        should be sufficiently familiar with
                                        the policy and procedural aspects of
                                        the OEP to answer questions and
                                        determine eligibility.

     2.   Has an informational service   2.   This information should include
concerning the OEP been provided   eligibility requirements and
to the serviced work force,   positions, grades and overseas
reinstatement eligibles, and members   locations on the current Acceptance
of other Federal agencies upon   and Positive Recruiting Lists. It
request?   should be emphasized that
                                        registration in the OEP is no
                                        guarantee of overseas employment.
                                        Registration in the OEP provides
                                        consideration for employment as
                                        vacancies occur in the countries and
                                        for the positions and grade levels
                                        for which an applicant is
                                        registered. Also it should be
                                        emphasized to applicants that
                                        contact is not made by the applicant
                                        with the CRA or other Defense
                                        Components.

     3.   Do applicants meet all   3.   Applicants must meet
registration eligibility   professional eligibility
requirements?   requirements and must meet
                                        suitability and adaptability
                                        requirements for overseas
                                        assignment. Questionable
                                        characteristics, behavior,
                                        performance or past misconduct is
                                        sufficient grounds for disqualifying
                                        an applicant. No person will be
                                        registered who is a known risk
                                        with respect to suitability ,
                                        adaptability to special living and
                                        working conditions, or who may be
                                        lacking in any way in technicial
                                        qualifications.

In addition to the checks for
discipline problems, indebtedness,
etc., the CPO should be checking on
attendance, extensive use of sick
leave and any behavior, performance
or conduct problem.

Although less information will be
available on reinstatement eligibles
and non-DoD Federal employee
applicants, it is essential that a
sufficient check be made to enable
the registering CPO to render an
evaluation.

4. Have ineligible applicants
been so advised?

4. If the applicant cannot be
registered due to lack of technical
qualifications or because he/she is
unsuited for overseas employment,
he/she should be so advised.

5. Are skills selected
properly? Does applicant qualify?

5. Applicants may be registered for
three(3) positions for which they
meet fully the applicable
qualification standards. They may
register only for those positions
and grade levels on the current
Acceptance and Positive Recruiting
Lists for the countries acceptable
to the applicant.

6. Are registrants resumes
reviewed and kept up-to-date?

6. Each Resumes Audit for the OEP
which is received by the CPO in
response to a new registration or
file maintenance of a current
registration should be reviewed to
insure that all data contained in
the resume are as intended.
Registration Error Listings should
be reviewed, cause of error
determined, proper corrective action
taken and CRA notified within five
workdays.

GENERAL POLICY & SUPPORT
GUIDE QUESTIONS

EVALUATION CRITERIA

7. Has post-registration suitability been determined?

7. In the event any type of suitability or adaptability situations arise following registration which would have eliminated the registrant initially, the CPO should delete the registrant and so inform him/her.

8. Are registrations maintained in a timely manner? Deleted?

8. Each registrant will be notified annually that his/her registration will be terminated unless he/she desires to continue registration for an additional year - in which case, the registrant should review the form and up-date experience and training as appropriate. The CPO should review current Acceptance and Positive Recruiting Lists against the registrant's skills to assure that the skills are reflected on one of those listings. If none of the registrants skills are on the Lists and he/she does not qualify for other skills he/she should be removed from the OEP.

9. Is prompt action taken on inquiries of availability and registrant's reply thereto?

9. When an inquiry is received from an Overseas Recruiting Office, the CPO should determine immediately the registrant's availability subject to meeting any special physical or position requirements. The Overseas Recruiting Office should be advised promptly of availability. Registrants indicating non-availability and who desire no further consideration will be dropped from the Program. Registrants who are selected will be processed for overseas assignment as requested by the Overseas Recruiting Office and removed from the Program. Auditors should review the process for quality control purposes.

GUIDE QUESTIONS	EVALUATION CRITERIA
10. Are records maintained for OEP registrants?	10. CPO's registering applicants into the OEP will assemble ar individual folder for each registrant which will include: name; positions, grades and locations for which registered; SF 171; offers received, accepted or declined; date dropped from the Program and reasons; plus any additional information determined to be of assistance.

B.   Overseas Recruiting Offices

1. Are overseas activities utilizing the OEP?	1. The Auditor should determine if the activity utilizes the system on a cost effective basis. An evaluation of OEP recruitment against agency career programs is appropriate.
2. Are names obtained from the CRA properly?	2. Vacancy Requisitions will be submitted as vacancies occur and will be annotated properly when the position, grade, or country does not appear on the current OEP Acceptance List. Resumes of matching registrants will be forwarded direct from the CRA to the Overseas Recruiting Office.
3. Are registrants contacted as prescribed in the Manual?	3. Inquiries shall be made through the registering CPO when the registrant is employed by the installation serviced by such office. If the registrant is not employed currently in DoD, the CPO or recruiting office may deal directly with the applicant.
4. Is the availability inquiry complete and sufficient to allow the prospective employee a judgement on desireability and availability?	4. Accompanying each inquiry will be a position description, special physical or position requirements, information on housing, concurrent travel, privately owned vehicles, local customs, differential, and allowances. The audit should evaluate if sufficient information is being provided.

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GENERAL POLICY & SUPPORT
        GUIDE QUESTIONS   EVALUATION CRITERIA

        5. Are report actions for-   5. After final selection is made,
warded to CRA promptly?   report actions should be forwarded
                                        to the CRA immediately showing
                                        placements, declinations and
                                        nonavailability only.

        6. Are requisitions cancelled   6. When a requisition is to be
in a timely manner?   cancelled, a Vacancy Requisition
                                        cancellation must be sent to the CRA
                                        immediately in order to avoid
                                        unnecessary registrations and
                                        referrals for a nonexistent
                                        position.

INTERNAL CONTROL FORMS

There are numerous effective ways to monitor personnel actions in process and to assure that the rules governing the Stopper List are followed. Herein are two checklists/control documents that are used by gaining activities that have proven highly effective.

Example #1

PRIORITY PLACEMENT CONTROL RECORD
LLND-NWC 12330/4 (10-77)

POSITION DESCRIPTION NO.	CODE	DATE ADVERTISED	
POSITION TITLE			SERIES
RECRUIT GRADE(S)	PROMOTION POTENTIAL	OPTION CODE(S)	
REASSIGNMENT EFFECTIVE DATE	SF-52 RECEIVED	PMA	

STOPPER LIST(S) CHECKED

Date SELECTION LIST SENT TO CODE:	REVIEW ☐ CODE 096 ☐ CODE 097	DIVISION HEAD (Initial)

In this process the centralized point of control logs in the SF-52 on the "Priority Placement Control Record" and utilizes it as a method of bi-weekly clearing while the staffing specialist has the SF-52 for filling through other means. If a match occurs there is an immediate requisition by the control point. The completed SF-52 is returned to the central point of control with the second copy of the form completed at which time the control point audits not only for certification that the Stopper List was checked, but against the list itself if appropriate, i.e., no exception to the PPP.

Example #2

This checklist is used for a preliminary and continuing review for the
staffing specialist (PART I) as well as a post audit checklist for
internal use (PART II). As in the first example, the internal
auditor actually checks the Stopper and does not rely on the blanks
being filled as the method of review.

In the example below those sections not related to the PPP have been
deleted.

(PART I)

Audit Check List for Completed Merit Promotion Case File
MCLSB,P 12300/07

AUDIT CHECK LIST FOR COMPLETED MERIT PROMOTION CASE FILE		
SF-52 Request #:	Date SF-52 Received in Employment Section:	
Position Title, Series, Grade:		
	Target Level:	
	MPP Vac Annct #:	

I. PRIORITY CONSIDERATIONS	
(INITIAL)	
_____	Repromotion Eligibles: None ___ (✓) # of Eligibles: _____ List Names: _____ _____ Date List Fwd': _____ Date List Recevied in CPO: _____ Action: _____
_____	Referral for failure to receive proper consideration: None ___ (✓) Action: _____
_____	Placement action due to Classification Downgrade: None ___ (✓) Comments: _____
_____	Internal RIF placement (e.g., mgt directed rsgs, abolishments, CAT II,etc.) Date Reviewed/Held: _____ Comments: _____
_____	Stopper List action: Cleared on: _____ Subsequent clearances: _____ Priority #: ____ Date resume requested: _____ Action/Comments: _____

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SF-52 Audit Check List of Priority Considerations
MCLSS,P 12300/08

SF-52 AUDIT CHECK LIST OF PRIORITY CONSIDERATIONS	
SF-52 Request #:	Date SF-52 Received in Employment Section:
Position Title, Series, Grade:	
Target Level:	

(INITIAL)

_____
Repromotion Eligibles: None ___ (✓)

# of Eligibles: _____

List names: _____ _____ _____

_____ _____ _____

_____ _____ _____

_____ _____ _____

Date List Fwd': ____ _____ Date List Received: _____

Action: _____

_____
Referral for failure to receive proper consideration: None ___ (✓)

Action: _____

_____
Placement action due to classification downgrade: None ___ (✓)

Comments: _____

_____
Internal RIF placements (e.g., mgmt directed rsgs, abolishments, CAT II, etc.)

Date reviewed/held: _____ Comments:_____

_____

_____
Stopper List action: Cleared on: _____

Priority #: _____ Date resume requested: _____

Subsequent clearances: _____ _____ _____

_____ _____ _____

Action/comments: _____

_____

_____

AUDITED BY: _____
DATE: _____

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*USGPO: 1980 — 660-338/54